



OPP-2003-0204

**ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY  
AGRICULTURE / WEIGHTS AND MEASURES DEPARTMENT**

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July 30, 2003

Public Information and Record Integrity Branch (PIRIB)  
Office of Pesticide Programs (OPP)  
Environmental Protection Agency (7502C)  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460-0001

AUG - 5 2003

Postmark 7/31/03

Attention: Docket ID Number OPP-2003-0204

Alameda County Department of Agriculture would like to respond to the USEPA's notice entitled " Zinc Phosphide: Notice of Filing a Pesticide Petition to Establish a Tolerance."

Let the record show that Alameda County Department of Agriculture supports the establishment of a federal food tolerance for the use of zinc phosphide on alfalfa.

Our alfalfa growers have suffered yield reduction and crop losses from infestations of meadow voles (*Microtus sp.*) over the years. Zinc phosphide usage has provided the needed control of this pest in alfalfa crops. Currently, no other pesticides or other pest control options offer any reasonable means of reducing meadow voles populations below the economical level that doesn't require control. The loss of zinc phosphide for use in alfalfa will have a devastating economical effect on the alfalfa growers in this county , as well as, within this State.

Zinc phosphide has a long history of usage in this state, along with food safety studies, efficacy studies and wildlife studies conducted by the California Department of Food and Agriculture that support the safe and effective use of zinc phosphide to control meadow voles in alfalfa.

Sincerely,

John Gouvaia, Deputy Agricultural Commissioner  
Alameda County Agriculture  
Alameda County Community Development Agency